

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In Re: David and Lisa Moore §
 § Bankruptcy Case No. 10-40579-H1-12
Debtor(s). §

**EMERGENCY MOTION TO RESCHEDULE ALL HEARINGS ON FEBRUARY
3, 2014 (DKT Nos. 134 and 139)**

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THIS MOTION SHOULD NOT BE GRANTED.

IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THIS MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

On January 9, 2014 Debtor's Counsel contacted Ronald Tonkin, Counsel for Ms. Bushman, and spoke to him on the telephone, in order to reach an agreement on the continuance but was unable to do so in spite of efforts. Ms. Bushman opposes this Motion.

Debtors are seeking a continuance of the February 3, 2014 hearings on Lisa Bushman's motions because Debtors are exhibiting at a professional trade show in Las Vegas February 5-8 and need to leave by February 1 in order to drive there including bringing equipment and set up. The contract is attached and it was signed last summer.

The original date for this hearing January 31 would have been the last day that was possible before the trip.

Debtor's request that the hearing on the motions be rescheduled to another day in February (the parties are hoping to meet the last week of January to discuss settlement), but would request that the following dates be avoided: February 9 and 28, possibly others in March (Mr. Tonkin has conflicting hearings), February 7, 11, 19-21, March 7, 24-26 (Mr. Wathen has conflicts), February 20-24, March 7-10, 14-17 (Moores have another trade show in Mt. Pleasant, Michigan in February and others in March). At this time counsel does not have Mr. Tonkin's March schedule and would request that if the Court deems it necessary to schedule it in March that that he first be given the opportunity to provide dates. A February date would be strongly preferred.

Respectfully Submitted,

1/14/14
Date

/s/ Alexander B. Wathen
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CERTIFICATE OF SERVICE

I certify that on January 14, 2014, or at the very latest the next day after the document was filed, I have or am contemporaneously serving a copy of these documents with all attachments on those entities listed below either by first class mail or through the Clerk by electronic mail.

1/14/14

/s/ Alexander B. Wathen

Date

Alexander B. Wathen

**BY ELECTRONIC MEANS THROUGH THE CLERK OR BY FIRST CLASS
MAIL:**

Ronald H. Tonkin, by email for Ms. Bushman